

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

CECELIA WALLACE, individually, and as the)
executor of the estate of WILLIAM M.)
WALLACE (deceased))

Plaintiffs,)

v.)

Cause No.: 1:06-cv-1560-RLY-TAB

JERRY HOUNSHEL, in his individual capacity,)
MARC LAHRMAN, in his individual and official)
capacity AS SHERIFF OF JACKSON COUNTY)
AND FORMER JAIL COMMANDER OF THE)
JACKSON COUNTY JAIL;)
DR. FAISAL AHMED;)
ADVANCED CORRECTIONAL)
HEALTHCARE, INC.; MISSY (MISER))
ROBINSON, NURSE, in her individual)
capacity; DAVID RIDLEN, in his individual)
capacity; JOSH TEIPEN, in his individual capacity,))

Defendants.)

**DESIGNATION OF EVIDENCE IN SUPPORT OF
PLAINTIFFS' MOTIONS FOR SUMMARY JUDGMENT**

Plaintiffs, by counsel, hereby designate the following items as evidence relied on in support of their Motions for Summary Judgment:

1. Complaint;
2. Answer by Defendant Advanced Correctional Healthcare & Dr. Faisal Ahmed;
3. Answer by Defendant Hounshel *et. al.*;
4. Deposition of Dr. Faisal Ahmed;
5. Deposition of Dr. Johnson;
6. Deposition of Jerry Wayne Hounshel;

7. Deposition of Marc Alan Larhman;
8. Deposition of Melissa Robinson;
9. Deposition of Tina Jean Benton;
10. Deposition of Dr. George Weir;
11. Deposition of Richard Andrew Rumph;
12. Deposition of Dr. John Christopher Bailey (parts a & b);
13. Deposition of Robert Lee Bayes, Jr.;
14. Deposition of Joshua E. Clark;
15. Deposition of David D. Ridlen;
16. Deposition of Adam William Brooks;
17. Deposition of Christopher Everhart;
18. Deposition of Douglas Richard Howard;
19. Deposition of Josh Lee Teipen;
20. Deposition of Stanley Dean Darlage;
21. Deposition of Eric Wills;
22. Deposition of Cecelia Wallace;
23. Jackson County Jail File—William Wallace (partial);
24. Coroner Summary Report of William Wallace;
25. Indiana State Jail Rules;
26. Expert Report of Dr. John Christopher Bailey;
27. Taped Statement Transcript between Dr. Ahmed & Sgt. Ridlen;
28. Taped Statement Transcript between Nurse Robinson & Sgt. Ridlen;
29. Nurse Melissa Robinson: Personnel File & Complaints/Reprimands;

30. 2005 Jackson County Jail Medical Protocols (Part A contains protocols starting with *Automatic Physician Referral* through *Eyes, Ears, Nose, and Throat*; Part B contains the second half);
31. Jackson County Jail Completed Medical Protocol used on March 25, 2006 for William Wallace;
32. Jackson County Jail Completed Medical Protocol used on April 2, 2006 for William Wallace;
33. Jackson County Jail Emergency Medical Call Log used on April 2, 2006 regarding William Wallace;
34. Diamond Pharmacy Services. Inc Daily Drug Order Form;
35. Jackson County Jail Medication Administration Record for William Wallace;
36. Jackson County Jail Medical Log Entry for April 3, 2006 as prepared by Nurse Robinson;
37. Defendant Marc Lahrman's Election Advertisement;
38. Questionnaires Sent to Surrounding Counties Regarding ACH;
39. Advanced Correctional Healthcare Norman R. Johnson, M.D. Background;
40. Dr. Johnson's Presentation Materials used on December 27, 2005;
41. Agreement for the Provision of Inmate Health Services at the Jackson County Jail;
42. Advanced Correctional Healthcare Correspondence with Sheriff Hounshel dated June 9, 2006;
43. Jackson County Jail CQI Minutes: September & May 2006 (*See referenced letters in #61*);
44. Jackson County Indiana Strategic Plan;

45. Completed Jackson County Jail Questionnaire;
46. Officer Benton's Inmate Medical Event Jail Log for March 25, 2006;
47. Officer Teipen's Inmate Medical Event Jail Log for March 25, 2006;
48. Officer Clark's Inmate Medical Event Jail Log for March 25, 2006;
49. Officer Ridlen's Inmate Medical Event Jail Log for April 2, 2006;
50. Officer Howard's Inmate Medical Event Jail Log for April 11, 2006;
51. Jackson County Jail Inmate Appointment Logs March – April;
52. Jackson County Jail Inmate Medical Event Logs indicating an inmate that has been
seen by Dr. Ahmed, as provided by Counsel for Sheriff Hounshel, *et.al.*;
53. Defendant Dr. Ahmed's Employment Application with Advanced Correctional
Healthcare;
54. Advanced Correctional Healthcare Work for Hire Agreement, signed 10/17/05 re: Dr.
Faisal Ahmed;
55. Advanced Correctional Healthcare Staffing & Salary Schedule, re: Dr. Faisal Ahmed,
signed 2/24/06;
56. Handwritten Note purporting to demonstrate Dr. Ahmed's schedule of visits to
Jackson County Jail produced by Advanced Correctional Healthcare's Accounting /
Human Resources Department;
57. Letter to Defendants Advanced Correctional Healthcare & Dr. Faisal Ahmed's
counsel, dated 4/2/08, requesting materials from Dr. Johnson's deposition which were
not originally produced;

58. Defendants Advanced Correctional Healthcare & Dr. Faisal Ahmed's counsel's response letter, dated 4/07/08, that states the basis for refusal to provide certain discovery items;
59. Email from Counsel for Sheriff Hounshel, *et. al.*, confirming that no training records existed for January of 2006;
60. Advanced Correctional Healthcare Employment Agreement, signed by Dr. Johnson 11/02/05, re: Dr. Faisal Ahmed;
61. Letters from ACH to Sheriff Hounshel referencing the CQI meetings (*See* p.7, letter dates June 9, 2006)

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2008, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system or by certified U.S. Mail. Parties may access this filing through the Court's system:

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